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Attorney for Defendant
ANGEL VERDUSCO-VILLA

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	2:13-cr-00428-KJD-CWH
)	
Plaintiff,)	
)	
vs.)	STIPULATION TO CONTINUE
)	SENTENCING
ANGEL VERDUSCO-VILLA,)	
)	(First Request)
Defendant.)	
_____)	

IT IS HEREBY STIPULATED by and between the United States of America, by and through DANIEL G. BOGDEN, United States Attorney ROBERT KNIEF, Assistant United States Attorney, ANGEL VERDUSCO-VILLA, Defendant, by and through his counsel DAN M. WINDER, ESQ., that the sentencing in the above-captioned matter currently scheduled for January 26, 2016 at the hour of 9:00 a.m., be vacated and continued until a date and time convenient for the Court.

This Stipulation is entered into based on the following:

1. The Defendant is in the process of drafting objections and preparing a sentencing memorandum.
2. Counsel for the Defendant has spoken to the Defendant, and the Defendant has no objection to the requested continuance.

1 3. Denial of this request for continuance would result in a miscarriage of justice.

2 4. For all the above-stated reasons, the ends of justice would best be served by a
3 continuance of the sentencing date.
4

5 5. The additional time requested by this Stipulation is excludable in computing the
6 time within which the trial herein must commence pursuant to the Speedy Trial
7 Act, Title 18, United States Code Section 3161 (h)(1)(D) and Title 18, United
8 States Code 3161 (h)(7)(A), when considering the factors under Title 18 United
9 States Code, Sections 3161 (h)(7)(B) and 3161 (h)(7)(B)(iv).
10

11 6. This is the first request to continue the sentencing.

12 **DATED** this 22nd day of January, 2016.
13
14

15 Respectfully submitted
16 UNITED STATES ATTORNEY

17 /s/ Robert Knief
18 ROBERT KNIEF
19 Assistant United States Attorney
20 333 Las Vegas Blvd. South, Ste 5000
21 Las Vegas, NV 89101

Respectfully submitted.
LAW OFFICE OF DAN M. WINDER, P.C.

17 /s/Dan M. Winder
18 DAN M. WINDER, ESQ.
19 State Bar No.: 001569
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22 Attorney for Defendant
23 ANGEL VERDUSCO-VILLA
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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	2:13-cr-00428-KJD-CWH
)	
Plaintiff,)	
)	
vs.)	FINDINGS OF FACT, CONCLUSIONS
)	OF LAW AND ORDER
ANGEL VERDUSCO-VILLA,)	
)	
Defendant.)	
)	
)	

FINDINGS OF FACT

Based on the pending Stipulation of the parties, and good cause appearing therefor, the Court finds that:

1. The Defendant is in the process of drafting objections and preparing a sentencing memorandum.
2. Counsel for the Defendant has spoken to the Defendant, and the Defendant has no objection to the requested continuance.
3. Denial of this request for continuance would result in a miscarriage of justice.
4. For all the above-stated reasons, the ends of justice would best be served by a continuance of the trial date.

1 5. The additional time requested by this Stipulation is excludable in computing the time
2 within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United
3 Stated Code Section 3161 (h)(1)(D) and Title 18, United States Code 3161 (h)(7)(A), when
4 considering the factors under Title 18 United States Code, Sections 3161 (h)(7)(B) and 3161
5 (h)(7)(B)(iv).
6

7 6. This is the first request for a continuance of the sentencing date.
8

9 **CONCLUSION OF LAW**

10 1. Additionally, denial of this request for continuance would result in a miscarriage of
11 justice.

12 2. For all the above-stated reasons, the ends of justice would best be served by a
13 continuance of the sentencing date, and such continuance outweighs the best interests of the public
14 and the defendant in a speedy trial.
15

16 3. The additional time requested by this Stipulation is excludable in computing the time
17 within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United
18 Stated Code Section 3161 (h)(1)(D) and Title 18, United States Code 3161 (h)(7)(A), when
19 considering the factors under Title 18 United States Code, Sections 3161 (h)(7)(B) and 3161
20 (h)(7)(B)(iv).
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ORDER

IT IS FURTHER ORDERED that the sentencing in the above-captioned matter currently set for January 26, 2016, at the hour of 9:00 a.m., be vacated and continued to February 3, 2016, at the hour of 9:00 a.m.

DATED this 25th day of January, 2016.



U.S. DISTRICT JUDGE
KENT J. DAWSON